

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA)	
)	Criminal No. 11-186-S-DLM
v.)	
)	
JOSEPH CARAMADRE)	
)	
and)	
)	
RAYMOUR RADHAKRISHNAN)	
)	
Defendants.)	

**GOVERNMENT'S RESPONSE TO
DEFENDANT CARAMADRE'S MOTION TO EXTEND TIME
TO FILE MOTION TO EXCLUDE RULE 15 DEPOSITIONS**

The United States of America, by and through its undersigned attorneys, hereby responds to Defendant Joseph Caramadre's "Motion To Extend Time to File Motion to Exclude Rule 15 Depositions."

While the government does not object to some additional time being provided to the defendants to prepare their motion, the request for 30 days is excessive. The Court has already scheduled a firm trial date and issued a scheduling order which requires the parties to meet a series of deadlines in order to complete pretrial litigation in a timely fashion. The government is concerned that the granting of Caramadre's request for an additional 30 days will lead to a series of delays in other deadlines established by the Court. The particular issue of admissibility of the Rule 15 Depositions has been contemplated by the parties since the Court's order authorizing the depositions in

2009.¹ Accordingly, the government does not object to Caramadre's Motion to Extend Time, but respectfully requests the continuance be limited to 14 days. Whatever period of delay the Court grants is excludable pursuant to the Speedy Trial Act.

Respectfully submitted,

PETER F. NERONHA
UNITED STATES ATTORNEY

/s/ John P. McAdams
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¹The timing of the Court's Scheduling Order was determined in part to accommodate Defendant Caramadre's demand for a speedy trial. Although Caramadre has demanded an immediate trial and refrained from joining in co-defendant Radhakrishnan's Motion to Continue the Trial Date to the fall, ironically he now seeks additional time to file a motion which was apparent to the parties in the fall of 2009.

CERTIFICATE OF SERVICE

I, hereby certify that on this 1st day of March, 2012, I caused the within Government's Response to Defendant Caramadre's Motion to Extend Time to File Motion to Exclude Rule 15 Depositions to be served via the Court's Electronic Filing System on:

For Joseph Caramadre:

Michael J. Lepizzera, Esq.

James T. McCormack, Esq.

For Raymour Radhakrishnan:

Olin Thompson, Esq.

/s/John P. McAdams
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